

1 to be somebody else.

2 Q Are you familiar with the idea of  
3 spoofing in relation to phone numbers?

4 A Yes.

5 Q Tell me what you know about that.

6 A Means pretending to be somebody that  
7 you're not.

8 Q And how do you go about pretending to  
9 be somebody that you're not?

10 A How do you go about pretending to be  
11 somebody that you're not?

12 Q You just said --

13 A I don't know the exact process.

14 Q What do you do? What do you know?  
15 Tell me everything you know.

16 A I just did. Pretending to be somebody  
17 that you're not.

18 Q Does such spoofing involve perhaps  
19 using a phone number that is not the person's normal  
20 phone number?

21 A Yes.

22 Q Have you ever done that?

23 A No.

24 Q Has anyone ever done that to you?

25 A Yes.

1 Q Who has done it to you?

2 A Telemarketers have done that, people  
3 have done that and, you know, they've said it was  
4 really me but, you know -- so, yeah.

5 Q Give me a name of a person.

6 A I can't -- right now think offhand.

7 Q When was the last time that it  
8 happened to you that you were spoofed with a phone  
9 number?

10 A In terms of a telemarketer?

11 Q No, in terms of any human person.

12 A I don't know that it's happened  
13 recently.

14 Q When was the first time that it  
15 happened?

16 A I don't recall.

17 Q Have you ever asked anyone to spoof  
18 another person?

19 A No.

20 Q Do you know why someone might want to  
21 spoof someone using a phone number?

22 MR. HELLER: Object. Calls for  
23 speculation.

24 You can reply. Just put my objection on  
25 the record.

1 A I don't know.

2 Q Let's go back to the interrogatories  
3 that we marked as Exhibit-7.

4 Take a look at question number four.  
5 And I'm gonna ask you to read it out loud into the  
6 record.

7 A On page six?

8 Q It's on page six.

9 A Question number four?

10 Q Yes.

11 A "Set forth your basis for calling  
12 Plaintiff 132 times on October 10th, 2018."

13 Q Did you call John Doe 132 times on  
14 October 10, 2018?

15 A I don't recall.

16 Q Did you call him many times?

17 A I called him many times but I don't  
18 know that I called him on specifically that date.

19 Q Was there any date, without  
20 necessarily stating the date, that you called John  
21 Doe multiple times in one day?

22 A Yes.

23 Q When did that occur?

24 A It occurred in the fall of 2018.

25 Q What was the reason that you did that?

1           A           The reason I called him? Asking him  
2           to halachically dissolve what was a Jewish marriage.

3           Q           Jewish marriage between whom?

4           A           Between me -- between John Doe and I.

5           Q           And when you use the term  
6           halachically, which I'm gonna spell for this  
7           record -- I think it would be H-A-L-A-C-H-I-C-A-L-Y?  
8           L-L-Y or L-Y?

9           A           L-L-Y.

10          Q           What does the word halachically mean?

11          A           According to the Jewish law.

12          Q           Are you a rabbi?

13          A           Am I a rabbi?

14          Q           Are you a rabbi?

15          A           No, I am not.

16          Q           Have you ever attended any rabbinical  
17          school?

18          A           Rabbinical?

19          Q           Yes.

20          A           Not rabbinical.

21          Q           Well, you're kind of indicating by  
22          your reaction --

23          A           Jewish seminary.

24          Q           Allow me to finish -- that you  
25          attended something else.

1 now discussing your answer that you submitted.

2 A Okay.

3 Q You said you never saw this before.  
4 So I'm going to ask you questions about this answer  
5 to interrogatory number four.

6 The question asked about a specific  
7 date. And you answered, Defendant responds as  
8 follows: I do not recall calling 132 times.

9 Do you see that on the screen?

10 A Yes.

11 Q But your answer doesn't say I didn't  
12 call on that date. It only says I do not recall  
13 calling 132 times.

14 So in fact your sworn answers to  
15 interrogatories, which you never saw before, don't  
16 say that it didn't occur on the date in the  
17 interrogatory itself which was October 10, 2018.

18 So I'm asking you straight. Is your  
19 interrogatory answer correct or is your testimony  
20 correct that you don't remember the date?

21 A Both.

22 Q Both?

23 A Both.

24 Q Why are both correct?

25 A Well, if you're saying that it's

1     October 10th, it could be October 10th. You asked  
2     me is it October 10th. I don't know the date. I  
3     don't write down dates of when I speak to a person.  
4     Unless there's a specific reason that I need to do  
5     it.

6             Q           Well, if you call someone 132 times  
7     it's going to be on your phone somewhere that you  
8     called that person on that date, correct?

9             A           It should be.

10            Q           Did you ever check your phone to  
11    determine whether you called John Doe 132 times on  
12    October 10th?

13            A           No, I have not checked my phone.

14            Q           And you gave a reason but let's look  
15    at the reason that you give in your sworn answer  
16    which you haven't seen yet.

17                        However, I am quoting: I remember  
18    being desperate to reach Mr. Doe as I wanted to  
19    secure a Get -- that's in quotes, capital G-E-T --  
20    from him. Due to the fact that on three separate  
21    occasions over the prior year, Mr. Doe had handed me  
22    jewelry and said the required verse which makes a  
23    formal declaration of the transaction required by  
24    Jewish law to formalize a betrothal between a man  
25    and a woman.

1 Do you see that?

2 A Yes.

3 Q Why didn't you call Mr. Doe 132 times  
4 before October 10th?

5 A I have communicated with him. Many  
6 occasions.

7 Q Why didn't you call Mr. Doe repeatedly  
8 before October 10th of 2018 to make this request  
9 that he --

10 A I have made this request. I have made  
11 that request.

12 Q When was the time you made the request  
13 before the 132 calls?

14 A Several times.

15 Q When?

16 A 2018 between September and October.

17 Q Several times?

18 A Yes.

19 Q But you never called him 132 times?

20 A I don't know how many times. You keep  
21 saying 132, I don't -- I never counted.

22 Q Was it more than ten times that you  
23 called him?

24 A Yes.

25 Q And in fact, you knew that when you

1       were calling Mr. Doe those multiple times, he was in  
2       Israel, correct? You knew that?

3               A           Possibly. I don't remember.

4               Q           Not possibly, you do remember?

5               A           I don't remember.

6               Q           You don't remember?

7               A           I don't remember where he was at the  
8       time.

9               Q           You don't remember Mr. Doe telling you  
10      specifically I'm in Israel now?

11              A           I know Mr. Doe told me many occasions.  
12      I don't remember if it was that particular time that  
13      he said he was in Israel.

14              Q           You don't remember specifically  
15      Mr. Doe telling you he was with his son in Israel,  
16      you don't --

17              A           I wouldn't know if he was with his son  
18      or not. I don't recall that.

19              Q           Do you recall demanding that Mr. Doe  
20      prove to you that he was in Israel and he took a  
21      photograph of himself and his son and a napkin from  
22      a Kosher restaurant in Israel and sent it to you; do  
23      you remember that?

24              A           He often sent me pictures of where he  
25      was.



1 Q You're not answering the question.

2 A I don't recall.

3 Q Why did you call Mr. Doe multiple  
4 times on or about October 10th?

5 A Because he refused to dissolve what he  
6 created as a Jewish marriage.

7 Q And he didn't answer any of those  
8 calls, correct?

9 A He answered -- I believe he answered  
10 some of them, I don't remember. But -- there were  
11 times I guess he did not.

12 Q Mrs. Sebrow, when you called Mr. Doe  
13 these multiple times in October of 2018, did he  
14 answer any of your phonecalls or not?

15 A I don't recall.

16 Q So you just kept on calling?

17 A I don't recall.

18 Q Your intention was to harass him?

19 A No.

20 Q Your intention was to --

21 MR. HELLER: Objection.

22 Q -- make him come to the phone, yes?

23 A I called him to reach him.

24 Q You called him to reach him multiple  
25 times and when you were unsuccessful you called him

1 again, correct?

2 MR. HELLER: I'm gonna put my  
3 objection on the record. This is harassing the  
4 witness repeatedly asking a question that has  
5 been asked and answered several times.

6 Q Answer the question, please.

7 A I did. It was asked, it was answered.

8 Q What was asked and answered?

9 A You asked me whether I called him.

10 Q Are you refusing to answer the  
11 question?

12 A Repeat the question that you want me  
13 to answer.

14 Q I'm gonna ask the court reporter to  
15 read back the question.

16 (Whereupon, the last question was  
17 read back by the reporter.)

18 A Yes.

19 Q And the excuse that you're offering in  
20 your answers to interrogatories is that you wanted  
21 to secure a Get from him?

22 A That's correct.

23 Q What's a Get?

24 A It's a Jewish divorce.

25 Q Is there a procedure in order to